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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VOTING RIGHTS DEFENSE PROJECT, *et al.*,

Plaintiffs,

v.

ALEX PADILLA, *et al.*,

Defendants.

Case No. C 16-02739 WHA

**DECLARATION OF RICARDO REYNOSO
IN SUPPORT OF OPPOSITION TO
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTIVE RELIEF**

Complaint filed: May 20, 2016
Date: June 1, 2016
Time: 11:00 a.m.
Department: 8
Judge: Hon. William Alsup

1 I, Ricardo Reynoso, declare as follows:

2 1. I have worked and been a trainer in eight elections with the Registrar of Voters
3 ("ROV") for the County of Alameda, State of California since 2012. I am a poll worker trainer
4 this year as well. I have personal knowledge of the matters set forth herein and, if called upon,
5 could testify competently thereto.

6 2. My training sessions cover all aspects of poll worker duties on Election Day,
7 including NPP voters and their cross-over voting options.

8 3. I trained Ms. Dawn DelMonte at the poll worker training. I was the instructor. I
9 used the poll worker training materials for Alameda County, located
10 at: <http://www.acgov.org/rov/documents/ClerkPollWorkerTraining.pdf>.

11 4. The video in this link was included in the poll worker training slides and shown at
12 the training (<https://youtu.be/clVVaTdejdg>). In fact, one trainee was not understanding the
13 cross-over options, so I showed the video twice.

14 2. Consistent with the poll worker training materials and video, all poll workers at
15 this particular training session were instructed to offer a cross-over ballot without the NPP voter
16 having to request one. At the training, one slide was presented that specifically stated verbatim
17 what a poll worker should say to each NPP voter at each polling place: "As a Nonpartisan
18 Voter, you are entitled to vote Nonpartisan or in one of the following parties: American
19 Independent, Democratic, or Libertarian."

20 3. I recall one individual who indicated that NPP voters should receive Demcoratic
21 ballots. The class had seasoned poll workers who corrected her, noting that they could receive
22 Democratic, American Independent, or Libertarian ballots.

23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct.

25 Executed at Oakland, California, on May 31, 2016.

26
27 
28 Ricardo Reynoso